

Exhibit 19

CONFIDENTIAL

Page 1

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION
MOTHER DOE, INDIVIDUALLY AND AS THE
MOTHER AND NATURAL GUARDIAN FOR JANE
DOE, A MINOR,
Plaintiff,
vs. CASE NO.
3:18-CV-02731-CMC

RICHLAND COUNTY SCHOOL DISTRICT TWO,
SHERIFF OF RICHLAND COUNTY IN HIS
OFFICIAL CAPACITY D/B/A RICHLAND COUNTY
SHERIFF'S DEPARTMENT ("RCSD"), JOHN E.
EWING, AND JAMEL BRADLEY,

Defendants.

DEPOSITION OF: [REDACTED]
DATE: November 19, 2019
TIME: 9:35 a.m.
LOCATION: Law Offices of
Halligan, Mahoney & Williams
1301 Gervais St., Suite 1400
Columbia, SC

TAKEN BY: Counsel for the DEFENDANTS
REPORTED BY: SARAH E. YOUNG

Job No. CS3662485

CONFIDENTIAL

Page 37

1 Q. Okay. So every other occasion, it
2 occurred at school?

3 A. Yes.

4 Q. And, again, I'm not asking you to -- to
5 put a, you know, specific number, but can you --

6 A. I don't have a number.

7 Q. -- give an estimate? Maybe the better
8 way of asking this, is it something that occurred
9 every day or once --

10 A. Not every day, but often.

11 Q. Would it occur every week?

12 A. Maybe. I -- I -- I don't remember.

13 Like it was -- I had like communications with him
14 for a -- relationship, whatever we want to call
15 it, --

16 Q. Uh-huh.

17 A. -- like for a long time.

18 Q. Okay.

19 A. Like a couple months. Like almost
20 until I graduated. Like I think it ended before I
21 graduated, a month or two before.

22 Q. Okay. Yeah, that was going to be one
23 of the questions. I was just trying to understand
24 when -- when it started, like when the sexual
25 activity started?

CONFIDENTIAL

Page 38

1 A. I don't --

2 Q. And then when it ended?

3 A. -- know a month. Maybe before
4 Thanksgiving. Maybe before Christmas. I don't
5 remember.

6 Q. And then you said it stopped when?

7 A. I don't know a month, but definitely
8 before May, before graduation. I was focused on
9 being a senior and enjoying myself.

10 Q. Uh-huh. What made you, I guess, decide
11 to stop?

12 A. I was about to graduate.

13 Q. Uh-huh.

14 A. And yeah, when I'm graduated, there's
15 no point in me going to a high school or
16 communicating with staff from there.

17 Q. When all of this was going on, are you
18 aware of Deputy Bradley engaging in the same type
19 of activities with any other female students?

20 A. No, but like in the hallways, girls
21 would hug on him and he -- I'm pretty sure multiple
22 occasions I've witnessed him like giving shoulder
23 massages to girls in the hallway. Like girls talk
24 to him. Guys talk to him. He was super friendly
25 with everybody. Like friendly, friendly. I don't